

## IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GORDON D. SONDLAND

Plaintiff,

v.

THE UNITED STATES OF AMERICA

Defendant.

No. 21-2083C

(Judge Honorable Loren A. Smith)

**PLAINTIFF'S EXHIBIT LIST**

| <b>No.</b> | <b>Description</b>  | <b>Offered</b> | <b>Authenticity<br/>Stipulation</b> | <b>Admissibility<br/>Stipulation</b> | <b>Admitted</b> |
|------------|---|----------------|-------------------------------------|--------------------------------------|-----------------|
| 1.         | Plaintiff's Amended Complaint [Dkt. 25]   |                |                                     |                                      |                 |
| 2.         | Westfall Certification [Dkt. 12]  |                |                                     |                                      |                 |
| 3.         | 09-26-2019 Email from McDermott to Lisa Kenna re Payment of Fees  |                |                                     |                                      |                 |
| 4.         | 09-27-2019 Letter to Pompeo re Depo Schedule - US0000921-0000924  |                |                                     |                                      |                 |
| 5.         | 09-27-2019 Letter to Sondland from Engel and Schiff re Deposition Appearance on 10-10-2019                              |                |                                     |                                      |                 |
| 6.         | 09-29-2019 Luskin email to String, Sondland, McDermott, Kenneth Thomas and Geneva Sarni re Compliance with RFD Requests |                |                                     |                                      |                 |

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|-----|--|--|--|--|--|
| 7.  | 10-04-2019 Email from McDermott to Marik String re Claims for Costs                                    |  |  |  |  |
| 8.  | 10-07-2019 Letter to Luskin from Brian Bulatao re Instructions Not to Appear                           |  |  |  |  |
| 9.  | 10-21-2019 Email from Carol Leonnig to Luskin re scope of depo and documents (PH_02891-02892)          |  |  |  |  |
| 10. | 10-08-2019 Email from Sondland to Pompeo re Prep for Testimony   |  |  |  |  |
| 11. | 10-08-2019 Letter to Sondland from Adam Schiff; Elijah Cummings re Deposition Appearance on 10-16-2019 |  |  |  |  |
| 12. | 10-14-2019 Letter to Sondland from Adam Schiff; Elijah Cummings re Depo on 10-17-2019                  |  |  |  |  |
| 13. | 10-25-2019 Email re payments made (SONDLAND_000653-000717)   |  |  |  |  |
| 14. | 11-04-2019 Declaration of Gordon Sondland  |  |  |  |  |
| 15. | 11-07-2019 Email from Clifton Johnson to Sondland re Info on Assistance with Private Counsel Fees      |  |  |  |  |
| 16. | 11-12-2019 Subpoena to Gordon Sondland   |  |  |  |  |
| 17. | 11-21-2019 Senate Letter to Pompeo (US0001899-1900)  |  |  |  |  |

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|-----|---|--|--|--|--|
| 18. | 11-24-2019 Email from Robert Luskin to Marik String re DOS Legal Assistance Program                                       |  |  |  |  |
| 19. | 12-09-2019 Email from Roberts to Marik String with Sondland invoices  |  |  |  |  |
| 20. | 01-28-2020 Email from Sondland to Bechbuhl re Payment of Sondland invoices  |  |  |  |  |
| 21. | 02-06-2020 Schedule for T. Ulrich Bechbuhl  |  |  |  |  |
| 22. | 02-24-2020 Email from Jim McDermott to Sondland re Inquiry on Status of Legal Fees  |  |  |  |  |
| 23. | 03-04-2020 - Email from Luskin to Liberman re Partial Reimbursement   |  |  |  |  |
| 24. | 06-09-2020 Email from Burke to Luskin re DOS reimbursement (Burck Ex. 2)  |  |  |  |  |
| 25. | 06-23-2020 letter from Paul Hastings to Marik String re Final Attempt for Payment of Fees                                 |  |  |  |  |
| 26. | 08-28-2020 Email from Luskin to String re Sondland reimbursement (US0001151)  |  |  |  |  |
| 27. | 09-10-2020 Email from Luskin to Marik String re Phone Call re Assurances to Sondland re Reimbursement of Expenses in Full |  |  |  |  |
| 28. | 09-24-2020 Email from Burck to Luskin re connecting with Pompeo   |  |  |  |  |

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|-----|---|--|--|--|--|
| 29. | Defendant Response to Plaintiff's Interrogatories |  |  |  |  |
| 30. | Handwritten Notes of Kwame Manley                 |  |  |  |  |
| 31. | Itemization of Monies Due to Sondland             |  |  |  |  |
| 32. | Notes of James McDermott                          |  |  |  |  |

Additionally, Plaintiff reserves the right to introduce either portions of deposition transcripts or the transcripts in their entirety as trial exhibits.

January 28, 2025

Respectfully submitted,




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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of January, 2025, I electronically filed the foregoing **PLAINTIFF'S EXHIBIT LIST** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Respectfully Submitted,



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